

Gordon & Rees LLP
101 West Broadway, Suite 2000
San Diego, CA 92101

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

FLOTSAM OF CALIFORNIA, INC.,
dba NOLAND'S ON THE WHARF and
SHORELINE SURF SHOP,

Plaintiff,

vs.

HUNTINGTON BEACH CONFERENCE
AND VISITORS BUREAU,

Defendant.

CASE NO. C 06-07028 MMC

Judge: Hon. Maxine M. Chesney

**STIPULATION TO EXTEND
DISCOVERY AND RELATED
DEADLINES; ~~PROPOSED~~ ORDER
THEREON**

HUNTINGTON BEACH CONFERENCE
AND VISITORS BUREAU,

Counterclaimant,

vs.

FLOTSAM OF CALIFORNIA, INC., dba
NOLAND'S ON THE WHARF and
SHORELINE SURF SHOP,

Counterdefendant.

Discovery Cut-Off: Sept. 14, 2007
Pre-Trial Conference: Feb. 12, 2008
Trial: Feb. 25, 2008

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1 IT IS HEREBY STIPULATED by and between the parties, through their respective
2 attorneys of record, to continue the pre-trial deadlines and trial date as set by the Court in its
3 Civil Minutes of February 23, 2007.

4 The parties are currently engaged in settlement negotiations and may have reached a
5 tentative settlement. Because the parties are negotiating the terms and conditions of settlement,
6 the parties believe there is good cause to extend the pre-trial and trial dates in this case.

7 The parties propose the following schedule:

- 8 1) Discovery cut-off currently set for September 14, 2007, to be continued to
9 October 14, 2007.
- 10 2) Deadline for parties to name experts currently set for October 5, 2007, to be continued to
11 November 5, 2007.
- 12 3) Deadline for parties to name rebuttal experts currently set for October 19, 2007, to be
13 continued to November 19, 2007.
- 14 4) Expert discovery cut-off currently set for November 9, 2007, to be continued to
15 December 9, 2007.
- 16 5) Joint Statement currently due by November 2, 2007, to be continued to December 2,
17 2007.
- 18 6) Further Status Conference currently set for November 9, 2007, to be continued to
19 December 9, 2007.
- 20 7) Dispositive motions filing deadline currently set for November 23, 2007, to be continued
21 to December 23, 2007.
- 22 8) Pretrial Conference currently set for February 12, 2008, to be continued to March 12,
23 2008.
- 24 9) Trial currently set for February 25, 2008, to be continued to March 25, 2008.

25 IT SO STIPULATED.

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Dated: September 7, 2007

GORDON & REES LLP

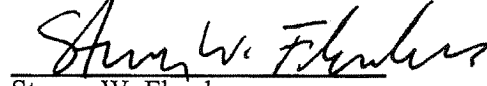
by


Richard P. Sybert
Attorneys for Defendant/Counterclaimant
HUNTINGTON BEACH CONFERENCE
AND VISITORS BUREAU

Dated: September 7, 2007

TOWNSEND AND TOWNSEND AND
CREW LLP

by


Steven W. Flanders
Attorneys for Plaintiff/Counterdefendant
FLOTSAM OF CALIFORNIA, INC.

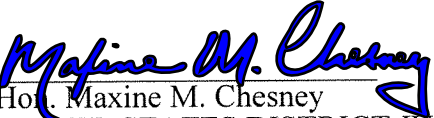
~~PROPOSED~~ ORDER

Upon the stipulation of counsel and good cause appearing ~~therefore, the pre-trial~~ for a more limited continuance than that proposed by the parties, the pretrial deadlines and dates ~~deadlines and trial~~ are continued as follows:

- 1) Discovery cut-off currently set for September 14, 2007, to be continued to ~~October 14, 2007.~~ October 12, 2007.
- 2) Deadline for parties to name experts currently set for October 5, 2007, to be continued to ~~November 5, 2007.~~ October 26, 2007.
- 3) Deadline for parties to name rebuttal experts currently set for October 19, 2007, to be continued to ~~November 19, 2007.~~ November 9, 2007.
- 4) Expert discovery cut-off currently set for November 9, 2007, to be continued to ~~December 9, 2007.~~ November 30, 2007.
- 5) Joint Statement currently due by November 2, 2007, to be continued to ~~December 2, 2007.~~ November 30, 2007.
- 6) Further Status Conference currently set for November 9, 2007, to be continued to ~~December 9, 2007.~~ December 7, 2007, at 10:30 a.m.
- 7) Dispositive motions filing deadline currently set for November 23, 2007, to be continued to ~~December 23, 2007.~~ December 7, 2007.
- 8) Pretrial Conference currently set for February 12, 2008, ~~to be continued to March 12, 2008.~~ remains as scheduled.
- 9) Trial currently set for February 25, 2008, ~~to be continued to March 25, 2008.~~ remains as scheduled.

IT IS SO ORDERED.

Dated: September 11, 2007


Hon. Maxine M. Chesney
UNITED STATES DISTRICT JUDGE